

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
CRAIG BRADLEY DEIMLER	:	
WILLIAM OLIVER FISHER-DEIMLER	:	CASE NO. 1:20-bk-00841
aka William Oliver Fisher Deimler; fka	:	
William Oliver Fisher	:	
Debtors	:	
	:	
PENNSYLVANIA HOUSING FINANCE	:	
AGENCY,	:	
Movant	:	
	:	
v.	:	
	:	
CRAIG BRADLEY DEIMLER	:	
WILLIAM OLIVER FISHER-DEIMLER	:	
aka William Oliver Fisher Deimler; fka		
William Oliver Fisher,		
Respondents		

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
7. Admitted.
8. Proof of current value of the property is demanded at trial and this averment is therefore denied.

9. Proof of current value of the property is demanded at trial and this averment is therefore denied.

10. Admitted.

11. Admitted that Debtors filed an amended plan to include post-petition payments through September. Proof of amounts owed is demanded at trial and this averment is therefore denied.

12. Denied that Movant has demonstrated cause for relief.

WHEREFORE, the Debtors respectfully request that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com